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through partnership

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July 15, 2021

**VIA ECF**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

RE: LRN Corp. v. Markel Ins. Co., No. 1:20-cv-8431 (S.D.N.Y.)

Dear Judge Gorenstein:

Pursuant to your June 3, 2021 Minute Order, and in light of the failure of Plaintiff LRN Corporation (“LRN”) and Defendant Markel Insurance Company (“Markel”) to reach resolution at mediation, please accept LRN’s below proposal regarding the adjournment of the existing deadlines as to LRN and Markel in the above-captioned action. We have conferred with counsel for Markel, and the parties could not reach agreement on a revised schedule for the action.

Discovery Category	Previous Deadline	Proposed Deadline
Deadline to serve Requests for Production of Documents	May 14, 2021	7 days after entry of an order granting an updated scheduling order
Deadline to serve Interrogatories	May 14, 2021	7 days after entry of an order granting an updated scheduling order
Deadline to complete Fact Depositions	June 30, 2021	45 days after entry of an order ruling on LRN’s Motion to Compel
Deadline to serve Requests to Admit	June 15, 2021	30 days after entry of an order ruling on LRN’s Motion to Compel
Completion of Fact Discovery	July 12, 2021	60 days after entry of an order ruling on LRN’s Motion to Compel

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Completion of Expert Discovery, including disclosure of expert reports, production of underlying documents, and depositions	August 26, 2021	45 days after completion of Fact Discovery
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It should be noted that LRN and Arch Insurance Company (“Arch”) continue to engage in mediation dialogue and, should a settlement not be reached, LRN and Arch will submit a proposed schedule as to discovery between them within seven days of their mediation discussions concluding.

Lastly, there are currently two pending matters before the Court for resolution: (1) Motion to Dismiss the Complaint filed by Markel on February 1, 2021 (“Motion to Dismiss”); and (2) May 25, 2021 request by LRN for an informal conference, pursuant to Local Rule 37.2, compelling further discovery responses from Markel (“Motion to Compel”). Both the Motion to Dismiss and Motion to Compel have been fully briefed by the parties.

Respectfully submitted,



John N. Ellison

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